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March 3, 2005

Mr. Jeffrey J. Carlisle
Chief, Wireline Competition Bureau
Federal Communications Commission
445 12th Street S.W.
Washington, D.C. 20554

RE: Memorandum of Ex Parte Presentation
WC Docket No. 04-313, Review of the Section 251 Unbundling
Obligations of Incumbent Local Exchange Carriers

Dear Mr. Carlisle:

On February 18, 2005, in response to your request, SBC submitted a list of wire centers in its 13-state service territory that meet the non-impairment thresholds for high capacity loop and transport facilities established by the Commission in the *Triennial Review Remand Order*.¹ SBC provided that information publicly to facilitate implementation of the Commission's new network unbundling rules.

Since SBC's filing, a number of CLECs have asked SBC to provide the data on which SBC relied to identify wire centers meeting the Commission's non-impairment thresholds. In particular, these CLECs have asked for data concerning the number of retail business, UNE-L and business UNE-P lines, and/or the number of unaffiliated fiber-based collocators in each of the wire centers identified in SBC's filing. Accordingly, SBC is filing herewith the data underlying its February 18 filing. These data identify the number of business lines and/or unaffiliated fiber-based collocators in each wire center in SBC's service territory where the Commission's non-impairment thresholds are met.² The data are disaggregated to show the number of unaffiliated fiber-based collocators, and the number of retail business, UNE-L and business UNE-P line, and presented by CLLI code.

SBC is issuing an accessible letter to all of its CLEC customers specifically notifying them that the data now are available for review. To the extent any CLEC has a legitimate dispute about the wire centers listed or the underlying data, it should present that dispute to the Commission and SBC now, before the March 11 effective date of the new unbundling rules. Where a CLEC fails to do so, it cannot validly claim that it is entitled to the high capacity loop and transport facilities in wire centers that SBC has identified as meeting the non-impairment criteria. As a result, SBC will not accept orders for new high capacity loop and transport UNEs in such wire centers, including any orders that rely on such a claim.

¹ Letter of James C. Smith, Senior Vice President, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 18, 2005); Letter of Brian Benison, SBC Services, Inc. to Jeffrey J. Carlisle, Chief, Wireline Competition Bureau, FCC (filed Feb. 22, 2005) (revising the list of SBC wire centers meeting the Commission's non-impairment criteria to correct three minor and inadvertent errors).

² These data also include tandem offices as defined in CFR §51.319(e)(3)(i).

Confidential Data Redacted pursuant to protective order adopted in WC 04-313

WIRE CENTER	STATE	ARMIS 43-08 BUSINESS LINES	BUSINESS UNE- P	UNE-LOOP	TOTAL BUSINESS LINES	COLLOCATION WITH FIBER
		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
FYVLARHI	AR					
LTRKARCA	AR					
LTRKARFR	AR					
LTRKARMO	AR					
ALHBCA01	CA					
ANHMCA01	CA					
ANHMCA11	CA					
BKFDCA12	CA					
BKLYCA01	CA					
BRBNCA11	CA					
BSRNCA70	CA					
BVHLCA01	CA					
CHICCA01	CA					
CLCYCA11	CA					
CMTNCA01	CA					
CNCRCA01	CA					
CNPKCA01	CA					
CORNCA11	CA					
CRDMCA11	CA					
CRLSCA12	CA					
DLMRCA12	CA					
ELMNCA01	CA					
ELSGCA12	CA					
ELTRCA11	CA					
ESCNCA01	CA					
FRMTCA11	CA					
FRMTCA12	CA					
FROKCA11	CA					
FRSNCA01	CA					
FRSNCA13	CA					
FUTNCA01	CA					
GLDLCA11	CA					
GRDNCA01	CA					
GRDNCA02	CA					
GRDNCA03	CA					
HLWDCA01	CA					
HNPKCA01	CA					
HYWRCA11	CA					
IRVNCA11	CA					
IRVNCA12	CA					
LSANCA02	CA					
LSANCA03	CA					
LSANCA07	CA					
LSANCA08	CA					
LSANCA09	CA					
LSANCA10	CA					

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WIRE CENTER	STATE	ARMIS 43-08 BUSINESS LINES	BUSINESS UNE- P	UNE-LOOP	TOTAL BUSINESS LINES	COLLOCATION WITH FIBER
		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
LSANCA11	CA					
LSANCA34	CA					
LSANCA35	CA					
LVMRCA11	CA					
MDSTCA02	CA					
MLPSCA11	CA					
MTRYCA01	CA					
MTVWCA11	CA					
NAPACA01	CA					
NHWDCA01	CA					
NHWDCA02	CA					
NORGCA11	CA					
NSCRCA11	CA					
OKLDCA03	CA					
OKLDCA11	CA					
OKLDCA12	CA					
ORNGCA11	CA					
ORNGCA14	CA					
PLALCA02	CA					
PLALCA12	CA					
PLTNCA13	CA					
PSDNCA11	CA					
RDCYCA01	CA					
RVSDCA01	CA					
SCRMCA01	CA					
SCRMCA02	CA					
SCRMCA11	CA					
SCRMCA12	CA					
SHOKCA01	CA					
SHOKCA02	CA					
SHOKCA05	CA					
SKTNCA01	CA					
SLNSCA01	CA					
SNANCA01	CA					
SNANCA11	CA					
SNBUCA02	CA					
SNCRCA11	CA					
SNDGCA01	CA					
SNDGCA02	CA					
SNDGCA03	CA					
SNDGCA15	CA					
SNDGCA16	CA					
SNFCCA01	CA					
SNFCCA04	CA					
SNFCCA12	CA					
SNFCCA21	CA					

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		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
SNJSCA02	CA					
SNJSCA12	CA					
SNJSCA14	CA					
SNJSCA21	CA					
SNLNCA11	CA					
SNLOCA01	CA					
SNMCCA11	CA					
SNMTCA11	CA					
SNRSCA01	CA					
SNTCCA01	CA					
SNTCCA11	CA					
SNVACA01	CA					
SNVACA11	CA					
TRNCCA11	CA					
TUSTCA11	CA					
VISLCA11	CA					
VNNYCA02	CA					
WLANCA01	CA					
WNCKCA11	CA					
BRPTCT01	CT					
DNBRCT00	CT					
HRFRCT03	CT					
NWHNCT02	CT					
NWHNCT03	CT					
SMFRCT01	CT					
ARLHILAH	IL					
BLWDILBW	IL					
BNSVILBV	IL					
CHCGILCL	IL					
CHCGILED	IL					
CHCGILFR	IL					
CHCGILHB	IL					
CHCGILID	IL					
CHCGILKI	IL					
CHCGILLA	IL					
CHCGILLR	IL					
CHCGILLW	IL					
CHCGILMO	IL					
CHCGILNE	IL					
CHCGILSU	IL					
CHCGILWB	IL					
CHMPILCU	IL					
DSPLILXL	IL					
DWGVILDG	IL					
EGVGILEG	IL					
ELGNILEL	IL					

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		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
EMHRILET	IL					
GENVILGN	IL					
HFESILWL	IL					
HNDLILHI	IL					
LBRDILLM	IL					
LBVLILLI	IL					
LVPKILRN	IL					
NBRKILNB	IL					
NBRKILNT	IL					
NCHCILNC	IL					
NPVLILNA	IL					
NPVLILNE	IL					
OKBRILOA	IL					
PRRGILXL	IL					
RCFRILRE	IL					
RCFRILRT	IL					
RSLLILRZ	IL					
SCBGILCO	IL					
SKOKILSK	IL					
SPFDILES	IL					
WHTNILWH	IL					
WKGNILWK	IL					
WLANGILWG	IL					
BLTNIN01	IN					
CRMLIN01	IN					
EVVLIN03	IN					
FSHRIN01	IN					
IPLSIN01	IN					
IPLSIN07	IN					
IPLSIN08	IN					
IPLSIN21	IN					
SBNDIN01	IN					
KSCYKSCB	KS					
KSCYKSJO	KS					
KSCYKSLE	KS					
KSCYKSNA	KS					
TPKAKSJA	KS					
WCHTKSAM	KS					
ANARMIMN	MI					
BRHMMIMN	MI					
BTCKMIBC	MI					
DRBRMIFB	MI					
DTRTMIBL	MI					
DTRTMICL	MI					
DTRTMIRV	MI					
ELNSMIMN	MI					

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		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
FLNTMIMN	MI					
FRTNMIMN	MI					
GDRPMIBL	MI					
GDRPMIES	MI					
GDRPMISO	MI					
JCSNMIMN	MI					
KLMZMIFA	MI					
LIVNMIMN	MI					
LIVNMINW	MI					
LNNGMIMN	MI					
LNNGMINW	MI					
MDLDMIMN	MI					
NRVLMIMN	MI					
OKMSMIMN	MI					
PLMOMIMN	MI					
PNTCMIMN	MI					
RSVLMIMN	MI					
RYLOMIMN	MI					
SFLDMIMN	MI					
SFLDMIOK	MI					
TROYMIMN	MI					
TROYMISM	MI					
WRRNMIMN	MI					
WYNGMILX	MI					
KSCYMO02	MO					
KSCYMO05	MO					
KSCYMO55	MO					
SPFDMOMC	MO					
SPFDMOTL	MO					
SPFDMOTU	MO					
STLSMO01	MO					
STLSMO05	MO					
STLSMO07	MO					
STLSMO08	MO					
STLSMO21	MO					
STLSMO27	MO					
STLSMO41	MO					
STLSMO42	MO					
RENONV02	NV					
AKRNOH25	OH					
BCWDOH46	OH					
BKPKOH26	OH					
CLEVOH42	OH					
CLEVOH62	OH					
CLEVOH64	OH					
CLMBOH11	OH					

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		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
CLMBOH86	OH					
DBLNOH89	OH					
DYTNOH22	OH					
INDPOH52	OH					
TOLDOH21	OH					
WEVLOH88	OH					
WOTNOH88	OH					
OKCYOKCE	OK					
OKCYOKSK	OK					
TULSOKNA	OK					
TULSOKRI	OK					
TULSOKTB	OK					
TULSOKWO	OK					
AMRLTX02	TX					
AMRLTXFL	TX					
AUSTTXFI	TX					
AUSTTXGR	TX					
AUSTTXHI	TX					
AUSTTXHO	TX					
AUSTTXTE	TX					
BWVLTXLI	TX					
CRCHTXTU	TX					
DLLSTXAD	TX					
DLLSTXEM	TX					
DLLSTXFB	TX					
DLLSTXFL	TX					
DLLSTXLA	TX					
DLLSTXMC	TX					
DLLSTXME	TX					
DLLSTXNO	TX					
DLLSTXRE	TX					
DLLSTXRI	TX					
DLLSTXRN	TX					
DLLSTXRO	TX					
DLLSTXTA	TX					
ELPSTXMA	TX					
FTWOTXCR	TX					
FTWOTXED	TX					
FTWOTXEU	TX					
FTWOTXTE	TX					
HSTNTX08	TX					
HSTNTXBA	TX					
HSTNTXBU	TX					
HSTNTXCA	TX					
HSTNTXCL	TX					
HSTNTXFA	TX					

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		Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection	Redacted for Public Inspection
HSTNTXGP	TX					
HSTNTXHO	TX					
HSTNTXJA	TX					
HSTNTXMC	TX					
HSTNTXMO	TX					
HSTNTXNA	TX					
HSTNTXOV	TX					
HSTNTXOX	TX					
HSTNTXPR	TX					
HSTNTXSU	TX					
HSTNTXUN	TX					
LARDTXLA	TX					
LBCKTXPS	TX					
LBCKTXSW	TX					
MCALTXMU	TX					
MDLDTXMU	TX					
SNANTXBA	TX					
SNANTXCA	TX					
SNANTXDI	TX					
SNANTXFR	TX					
SNANTXPE	TX					
SNANTXTA	TX					
SNANTXWE	TX					
TYLRTXLY	TX					
APPLWI01	WI					
DEPRWI11	WI					
EUCLWI01	WI					
GNBYWI01	WI					
GNBYWI11	WI					
MDSNWI11	WI					
MDSNWI12	WI					
MDSNWI13	WI					
MDSNWI14	WI					
MDSNWI15	WI					
MDSNWI16	WI					
MILWWI12	WI					
MILWWI13	WI					
MILWWI16	WI					
MILWWI45	WI					
NENHWI11	WI					
OSHKWI01	WI					
WKSHWI47	WI					
		End Redacted	End Redacted	End Redacted	End Redacted	End Redacted

Jeffrey J. Carlisle
March 3, 2005
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The data submitted herewith include highly sensitive, confidential business information concerning the demand for high capacity services in SBC's territory, and facilities deployment by SBC's carrier customers. SBC therefore is submitting the data under seal, pursuant to the September 20, 2004, Protective Order issued in the above-referenced docket, and is designating the data "Copying Prohibited" pursuant to the Protective Order. SBC will make the data available to counsel for any requesting carrier pursuant to the terms of that order at the following location:

Kellogg, Huber, Hansen Todd, Evans and Figel P.L.L.C.
1615 M Street, N.W.
Suite 400
Washington, D.C. 20036

Counsel for requesting carriers who wish to schedule an appointment to view the information should call Kevin Walker at 202-367-7820.

Please give me a call if you have any questions.

Sincerely,

Attachment

CC: Michelle Carey
Tom Navin
Jeremy Miller
Ian Dillner

Definitions:

Business line. A business line is an incumbent LEC-owned switched access line used to serve a business customer, whether by the incumbent LEC itself or by a competitive LEC that leases the line from the incumbent LEC. The number of business lines in a wire center shall equal the sum of all incumbent LEC business switched access lines, plus the sum of all UNE loops connected to that wire center, including UNE loops provisioned in combination with other unbundled elements. Among these requirements, business line tallies (1) shall include only those access lines connecting end-user customers with incumbent LEC end-offices for switched services, (2) shall not include non-switched special access lines, (3) shall account for ISDN and other digital access lines by counting each 64 kbps-equivalent as one line. For example, a DS1 line corresponds to 24 64 kbps-equivalents, and therefore to 24 “business lines.”

Fiber-based collocator. A fiber-based collocator is any carrier, unaffiliated with the incumbent LEC, that maintains a collocation arrangement in an incumbent LEC wire center, with active electrical power supply, and operates a fiber-optic cable or comparable transmission facility that (1) terminates at a collocation arrangement within the wire center; (2) leaves the incumbent LEC wire center premises; and (3) is owned by a party other than the incumbent LEC or any affiliate of the incumbent LEC, except as set forth in this paragraph. Dark fiber obtained from an incumbent LEC on an indefeasible right of use basis shall be treated as non-incumbent LEC fiber-optic cable. Two or more affiliated fiber-based collocators in a single wire center shall collectively be counted as a single fiber-based collocator. For purposes of this paragraph, the term affiliate is defined by 47 U.S.C. § 153(1) and any relevant interpretation in this Title.